

# EXHIBIT 13

REDACTED

--- On Wed, 10/5/16, Sandra Chan <[SChan@JAMSADR.com](mailto:SChan@JAMSADR.com)> wrote:

> From: Sandra Chan <[SChan@JAMSADR.com](mailto:SChan@JAMSADR.com)>  
> Subject: RE: 30 (b) (6) template  
> To: "jeff shea" <[sheaj\\_2000@yahoo.com](mailto:sheaj_2000@yahoo.com)>  
> Date: Wednesday, October 5, 2016, 10:32 AM Mr. Shea:  
>  
> Mr. Quinn is not accepting any  
> further submissions on this matter.  
>  
> Best Regards,  
>  
> Sandra Chan  
> ADR Consultant  
>  
> JAMS  
> Two  
> Embarcadero Center, Suite 1500  
> San  
> Francisco, CA 94111  
> [schan@jamsadr.com](mailto:schan@jamsadr.com)  
> Phone 415-982-5267  
> Direct  
> 415-774-2611  
> Fax 415-982-5287  
>  
> JAMS Neutral Analysis:  
> Unbiased, confidential case evaluation from the best legal minds in  
> the business.  
>  
>  
>  
> -----Original Message-----  
> From: jeff shea [[mailto:sheaj\\_2000@yahoo.com](mailto:sheaj_2000@yahoo.com)]  
>  
> Sent: Wednesday, October 05, 2016 8:25 AM  
> To: Sandra Chan <[SChan@JAMSADR.com](mailto:SChan@JAMSADR.com)>

> Subject: Fw: 30 (b) (6) template  
>  
> Hi Sandra: If you've got  
> a spare moment, could you please share this e-mail and attachment with  
> Special Master Quinn? Please note that Lead Counsel has long had this  
> in its possession, as we sent it to Lauren (Russell) Capurro last year  
> prior to the fee application being submitted (I would certainly not  
> send this to you unless certain that it was also sent to and in  
> possession of Lead Counsel). It is of relevance because Lead Counsel  
> suggested at yesterday's hearing that my deposition preparation  
> responsibilities did not include higher level work such as helping to  
> prepare deposition outlines. This submission offers direct proof to  
> the contrary. Note that Lead Counsel also made similar assertions in  
> its Omnibus Response (ECF No.4853, P.49):  
> "Shea... did not perform the higher level of review involved in...  
> helping to prepare the deposition outline." Again, just sending as an  
> FYI to the Special Master. He naturally is free to consider or  
> disregard as he sees fit. Thanks.  
>  
>  
> Jeff  
> Shea  
>  
>  
> ---  
> On Fri, 6/29/12, jeff shea <[sheaj\\_2000@yahoo.com](mailto:sheaj_2000@yahoo.com)>  
> wrote:  
>  
> > From: jeff shea  
> <[sheaj\\_2000@yahoo.com](mailto:sheaj_2000@yahoo.com)>  
> > Subject: 30 (b) (6) template  
> > To: "Sylvie Kern" <[sylviekern@yahoo.com](mailto:sylviekern@yahoo.com)>  
> > Cc: "Kevin Pearl" <[kevin@facslaw.com](mailto:kevin@facslaw.com)>  
> > Date: Friday, June 29, 2012, 10:18 AM  
> > Sylvie: 30 (b) (6) template #2  
> > attached. Thanks  
> >  
>  
> >  
>  
> > Jeff  
>